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9 UNITED STATES DISTRICT COURT
10 NORTHERN DISTRICT OF CALIFORNIA
11 SAN FRANCISCO DIVISION

12 PLANNED PARENTHOOD FEDERATION OF
13 AMERICA, INC., PLANNED PARENTHOOD:
SHASTA-DIABLO, INC. dba PLANNED
14 PARENTHOOD NORTHERN CALIFORNIA;
PLANNED PARENTHOOD MAR MONTE,
15 INC.; PLANNED PARENTHOOD OF THE
PACIFIC SOUTHWEST; PLANNED
16 PARENTHOOD LOS ANGELES; PLANNED
PARENTHOOD/ORANGE AND SAN
17 BERNARDINO COUNTIES, INC.; PLANNED
PARENTHOOD OF SANTA BARBARA,
18 VENTURA AND SAN LUIS OBISPO
COUNTIES, INC; PLANNED PARENTHOOD
19 PASADENA AND SAN GABRIEL VALLEY,
INC.; PLANNED PARENTHOOD OF THE
20 ROCKY MOUNTAINS; PLANNED
PARENTHOOD GULF COAST; AND
21 PLANNED PARENTHOOD CENTER FOR
CHOICE;

22 Plaintiffs,

23 v.

24 CENTER FOR MEDICAL PROGRESS, BIOMAX
PROCUREMENT SERVICES, LLC, DAVID
DALEIDEN (aka "ROBERT SARKIS"), TROY
25 NEWMAN, ALBIN RHOMBERG, PHIL CRONIN,
SANDRA SUSAN MERRITT (aka "SUSAN
26 TENNENBAUM"), GERARDO ADRIAN LOPEZ,
and UNKNOWN CO-CONSPIRATORS, inclusive,
27

28 Defendants.

Case No. 3:16-CV-00236-WHO

**DECLARATION OF AMY L.
BOMSE IN SUPPORT OF
PLAINTIFFS' OPPOSITION TO
DEFENDANTS' MOTION TO STAY
PROCEEDINGS PENDING
APPEAL**

Date: December 21, 2016
Time: 2:00 p.m.
Place: Courtroom 2, 17th Floor

Judge: Hon. William H. Orrick, III

1 I, Amy L. Bomse, declare:

2 1. I am an attorney admitted to practice in the State of California. I am a partner of
3 the law firm of Arnold & Porter LLP, attorney for Plaintiffs Planned Parenthood Federation Of
4 America, Inc.; Plaintiff Planned Parenthood Shasta-Diablo, Inc. dba Planned Parenthood Northern
5 California; Planned Parenthood Mar Monte, Inc.; Planned Parenthood Of The Pacific Southwest;
6 Planned Parenthood Los Angeles; Planned Parenthood/Orange And San Bernardino Counties,
7 Inc.; Planned Parenthood Of Santa Barbara, Ventura And San Luis Obispo Counties, Inc; Planned
8 Parenthood Pasadena And San Gabriel Valley, Inc.; Planned Parenthood Of The Rocky
9 Mountains; Planned Parenthood Gulf Coast; and Planned Parenthood Center For Choice
10 (collectively "Plaintiffs") in the above-captioned action. I have personal knowledge of the facts
11 stated herein and, if called as a witness, could testify competently thereto.

12 2. On April 8, 2016, Defendants David Daleiden ("Daleiden"), Center for Medical
13 Progress ("CMP"), and BioMax Procurement Services, LLC ("BioMax") served their first set of
14 requests for production of documents on Plaintiffs, which had a total of forty-nine (49) requests.

15 3. On April 15, 2016, Defendant Troy Newman ("Newman") served his first set of
16 requests for production of documents on Plaintiffs, which had a total of twenty-four (24) requests.
17 That same day, Defendant Newman also served his first set of interrogatories on Plaintiffs, which
18 had a total of sixteen (16) interrogatories.

19 4. On May 27, 2016, Defendants Daleiden, CMP, and BioMax served their second set
20 of requests for production of documents on Plaintiffs, which had a total of four (4) requests. That
21 same day, Defendant Daleiden served one interrogatory on Plaintiff Planned Parenthood
22 Federation of America, Inc.

23 5. On June 7, 2016, Defendants CMP and BioMax served one request for admission
24 on Plaintiff Planned Parenthood of Santa Barbara, Ventura, and San Luis Obispo Counties, Inc.;
25 one request for admission on Plaintiff Planned Parenthood Shasta-Diablo, Inc. dba Planned
26 Parenthood Northern California; and one request for admission on Plaintiff Planned Parenthood
27 Mar Monte, Inc.

28 6. On July 15, 2016, Defendant Daleiden served six (6) interrogatories on Plaintiffs.

5 8. On September 13, 2016, Defendants CMP and BioMax served two (2) requests for
6 admission on Plaintiffs Planned Parenthood Gulf Coast.

7 9. On November 10, 2016, Defendant Newman served his second set of
8 interrogatories on Plaintiffs, which included a total of six (6) interrogatories.

9 10. To date, Plaintiffs have responded to eighty-three (83) requests for production,
10 thirty-four (34) interrogatories, and five (5) requests for admission.

11 11. In order to respond to Defendants’ discovery and gather evidence to support
12 Plaintiffs’ claims, Plaintiffs have retained a document vendor, collected documents from
13 numerous Planned Parenthood employees, and have been actively engaged in document review for
14 months.

15 12. To date, the parties have met and conferred at length to discuss, narrow, and
16 resolve various discovery disputes.

17 13. By the time Defendants' Motion to Stay Proceedings Pending Appeal is heard by
18 this Court, the parties anticipate exchanging their first sets of documents.

19 I declare under penalty of perjury under the laws of California and the United States of
20 America that the foregoing is true and correct, and that this declaration was executed on December
21 6, 2016, in San Francisco, California.

By: /s/ Amy L. Bomse
Amy L. Bomse